

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): February 14, 2018
2. Deadline for first request for production of documents and first request for interrogatories: March 20, 2018
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s)____; defendant(s) ____
3. Date for completion of any joinder or additional parties and amendment of the pleadings: February 28, 2018
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s)____; defendant(s) ____
4. Number of depositions by plaintiff(s) of: parties 10; non-parties 10
5. Number of depositions by defendant(s) of: parties 10; non-parties 10
6. Date of status conference (joint status report due two business days in advance): After August 1, 2018
7. Date for completion of fact discovery: August 1, 2018
8. Are expert witnesses needed? Yes: X No _____
- 8(a). Number of expert witnesses, if any, of plaintiff(s) medical TBA; non-medical TBA
- 8(b). Date of completion of those expert reports: September 3, 2018
- 8(c). Number of expert witnesses, if any, of defendant(s): medical TBA; non-medical TBA
- 8(d). Date of completion of those expert reports: October 3, 2018
9. Date of completion of expert discovery: October 3, 2018
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): November 5, 2018
11. Types of contemplated disposition motions by plaintiff(s) and dates for filing of those motions: TBA

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions:

TBA

13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.)

Yes: No X

14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.)

Yes: No X

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.)

Yes: X No